INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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(800) 451-6027
www.IN.gov/idem

October 4, 2002

Mr. Richard E. Parks
Newmar Corporation
P.O. Box 30
Nappanee, IN 46550-0030

Re: **039-16081**
Significant Source Modification to:
Part 70 Operating Permit No.: **T 039-7571-00157**

Dear Mr. Parks:

Newmar Corporation was issued Part 70 operating permit T 039-7571-00157 on October 18, 1999 for a motor home and travel trailer manufacturing source. An application to modify the source was received on June 5, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.

(b) One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.

(c) One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.

The following insignificant activity is also approved for construction at the source:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including three (3) makeup air units with a total heat input capacity of 9.192 million British thermal units per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments (Changed permit pages, TSD)
CAP/MES
cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michele Boner

SIGNIFICANT SOURCE MODIFICATION
PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Newmar Corporation
355 North Delaware Street
Nappanee, Indiana 46550-0030

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Fourth Significant Source Modification 039-16081-00157	Sections Affected: A.2, A.3, D.6 and the Quarterly Report Form
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: **October 4, 2002**

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary motor home and travel trailer manufacturing facility.

Responsible Official:	Richard E. Parks
Source Address:	355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address:	P.O. Box 30, Nappanee, Indiana 46550-0030
SIC Code:	3716 and 3792
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

a) EU-01 (Hardwoods)
- One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLP spray guns, for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)
- One (1) Dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

b) EU-02 (Custom Coating)
- Two (2) high volume low pressure (HVLP) spray applications for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

c) EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLP) spray application for coating metal frames, with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

d) EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)

e) EU-05 (FRP), One (1) FRP Booth (seam work on special orders), equipped with three (3) high volume low pressure (HVLP) spray and hand lay up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack SV-5. (1995)

f) EU-06 (R&D, Service & Warranty) Full body coating
- One (1) spray paint booth (R & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at Research and Development Center. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and each exhausting at two (2) stacks, identified as SV6-1A and SV6-1B and SV6-2A and SV6-2B, respectively, capacity: 1.0 motor home or travel trailer per hour, each. (1998)
- One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.
- One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.
- One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.

g) EU-07 (Woodworking)
- One (1) woodworking shop equipped with woodworking equipment, located in Building 3, using one (1) baghouse as control and exhausting internally, located at North Delaware Street. (1981)
- One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, attached to a portable dust collector as particulate control, exhausted internally, located at Research and Development Center. (1996)
- One (1) woodworking and machining shop equipped with woodworking and metalworking equipment, with one table saw attached to a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity, located at Service and Repair Center. (1998)

h) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;

i) One (1) diesel engine Test Cell with a capacity of 260 horsepower;

j) One (1) metal inert gas welding process with 9 welding stations with 1.05 lbs/hour rate of consumption of wire per station;

k) One (1) water based frame paint booth with rate of production as 0.1 unit per hour; and

l) One (1) undercoating booth, identified as EU-08, using an airless spray application system, coating a maximum of 2.5 wood and metal chassis per hour, exhausting to the general ventilation.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

a) Welding operations

b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326

IAC 20-6.

c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including three (3) makeup air units with a total heat input capacity of 9.192 million British thermal units per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

EU-06 (R&D, Service & Warranty) Full body coating
- One (1) spray paint booth (R & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at Research and Development Center. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and each exhausting at two (2) stacks, identified as SV6-1A and SV6-1B and SV6-2A and SV6-2B, respectively, capacity: 1.0 motor home or travel trailer per hour, each. (1998)
- One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.
- One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.
- One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to the BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), operation of the five (5) spray coating booths (BR-1, BR-2, BR-3, BR-4 and BR-5) without the use of add-on controls and with the following emission limitation and work practices will satisfy the BACT requirements and make the requirements of 40 CFR 52.21 and 326 IAC 2-2, PSD, not applicable:

(a) The total usage of VOC in the five (5) spray coating booths (BR-1, BR-2, BR-3, BR-4 and BR-5) shall not exceed 138.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The following work practices shall be performed:

(1) Cleaning motor home exteriors prior to painting, primer application, and base coat application - motor home exteriors will be hand-wiped with a cleaning solvent prior to the application of the first surface coating.
(2) Primer, base coat, and clear coat application - primer, base coats, and clear coat will be applied using high volume low pressure (HVLP) spray equipment.
(3) Paint repairs - paint repairs will be done using air atomized spray application to achieve the necessary atomization and blend needed for the repair.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.6.2 Volatile Organic Compound (VOC)

The spray paint booth, located at the Research and Development Center, is not subject to 326 IAC 8-1-6. However, any change or modification which may increase VOC potential emissions to 25 tons per

year from the spray paint booth, located at the Research and Development Center, shall require prior approval from the OAQ to determine applicability requirements of 326 IAC 8, before such change may occur.

D.6.3 Particulate Matter (PM and PM_{10}) [40 CFR 52, Subpart P] [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to 40 CFR 52, Subpart P, the PM from the five (5) spray coating booths, identified as BR-1 through BR-5, and the one (1) spray paint booth located at the Research and Development Center shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Any change or modification that increases the usage of solids in the coatings delivered to the applicators at the five (5) spray coating booths (BR-1 through BR-5) to 23,809 tons per twelve (12) consecutive month period shall cause the potential to emit PM and PM_{10} to increase to 250 tons per year or more, making the requirements of 326 IAC 2-2, PSD, applicable based on a sixty-five percent (65%) transfer efficiency and a ninety-seven percent (97%) control efficiency, and shall require prior IDEM, OAQ, approval.

D.6.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.6.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.6 VOC Emissions

Compliance with Condition D.6.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

D.6.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies) and in order to comply with Condition D.6.3, the dry filters for particulate matter overspray control shall be in operation in accordance with manufacturer's specifications and control emissions from the five (5) spray coating booths (BR-1 through BR-5) at all times when the paint booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.8 Training Requirements

(a) The Permittee shall implement an operator training program.

(1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operating shall be trained within 60 days of the date of

permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion . Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

(b) Additional inspection and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.9 Record Keeping Requirements

(a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in Conditions D.6.1 and D.6.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and EPA VOC Data Sheets necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the month of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.6.3(b), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the solids usage limit and PM and PM_{10} emission limit in Condition D.6.3(b).

(1) The amount and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The total solids usage for each month; and

(3) The weight of PM and PM_{10} emitted for each compliance period.

(c) To document compliance with Conditions D.6.7 and D.6.8, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.6.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.6.1 and D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This summary report shall include the monthly VOC emitted.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157
Facility: Entire Source
Parameter: VOC usage (tons)
Limit: 138.28 tons per twelve (12) consecutive month period from BR-1, BR-2, BR-3, BR-4 and BR-5;
70 tons per twelve (12) consecutive month period from B-2a and B-2b; and
<156 tons per twelve (12) consecutive month period from Spray Booths B-1, B-2, B-3, FRP Booth, the undercoating spray booth, and insignificant activities.

This form consists of 2 pages **Page 1 of 2**

Month: _____

Facility	VOC Limit (tons/ twelve (12) consecutive month period)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 through BR-5	138.28			
Paint Booths B-2a and B-2b	70			
Spray Booths B-1, B-2, and B-3, FRP booth, the undercoating spray booth, and other emissions from insignificant activities	< 156			

This form consists of 2 pages **page 2 of 2**

Month: _____

Facility	VOC Limit (tons/ twelve (12) consecutive month period)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 through BR-5	138.28			
Paint Booths B-2a and B-2b	70			
Spray Booths B-1, B-2, and B-3, FRP booth, the undercoating spray booth and other emissions from insignificant activities	< 156			

Month: _____

Facility	VOC Limit (tons/ twelve (12) consecutive month period)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 through BR-5	138.28			
Paint Booths B-2a and B-2b	70			
Spray Booths B-1, B-2, and B-3, FRP booth, the undercoating spray booth and other emissions from insignificant activities	< 156			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

October 4, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Source Modification to a Part 70 Operating Permit

Source Name:	**Newmar Corporation**
Source Location:	**355 North Delaware Street, Nappanee, Indiana 46550-0030**
County:	**Elkhart**
SIC Code:	**3716 and 3792**
Operation Permit No.:	**T 039-7571-00157**
Significant Source Modification No.:	**039-16081-00157**
Permit Reviewer:	**CarrieAnn Paukowits**

On August 15, 2002, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Newmar Corporation had applied for a Significant Source Modification to a Part 70 Operating Permit to construct three (3) spray coating booths, identified as BR-3, BR-4 and BR-5, with dry filters as controls, and three (3) insignificant natural gas-fired makeup air units, at the full body motor home and travel trailer coating operations (EU-06) at the existing motor home and travel trailer manufacturing source. The notice also stated that OAQ proposed to issue a Significant Source Modification and provided information on how the public could review the proposed Significant Source Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Source Modification to a Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the Significant Source Modification to a Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

The source modification number on the cover page of SSM 039-16081 was typed incorrectly. The number is corrected as follows:

Fourth Significant Source Modification 039-~~16801~~ **16081**-00157	Sections Affected: A.2, A.3, D.6 and the Quarterly Report Form
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

October 4, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source and Significant Permit Modifications

Source Background and Description

Source Name:	**Newmar Corporation**
Source Location:	**355 North Delaware Street, Nappanee, Indiana 46550-0030**
County:	**Elkhart**
SIC Code:	**3716 and 3792**
Operation Permit No.:	**T 039-7571-00157**
Operation Permit Issuance Date:	**October 18, 1999**
Significant Source Modification No.:	**039-16081-00157**
Significant Permit Modification No.:	**039-16219-00157**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a modification application from Newmar Corporation relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.

(b) One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.

(c) One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.

These booths are part of the full body motor home and travel trailer coating operations, identified as EU-06. The two (2) existing booths for this process, BR-1 and BR-2, were constructed in 1998 and modified in 2002 in Significant Source Modification 039-14882, issued on February 26, 2002, and Significant Permit Modification 039-15355, issued on March 13, 2002, to accommodate an increase in the number of motor homes and travel trailers requiring full body coating. The applicant has determined that the three (3) proposed booths are also required to meet the demands on the full body coating facility.

The applicant is also constructing three (3) makeup air units, with a total heat input capacity of 9.192 million British thermal units per hour. These units are insignificant activities pursuant to 326 IAC 2-7-1(21)(G)(i)(AA)(aa), natural gas-fired combustion sources with heat input equal to or less than ten

million (10,000,000) British thermal units per hour.

History

On June 5, 2002, Newmar Corporation submitted an application to the OAQ requesting to add additional surface coating booths to the existing full body coating operation at the existing motor home and travel trailer manufacturing source. Newmar Corporation was issued a Part 70 permit on October 18, 1999. Significant Source Modifications 039-11239, 039-12223 and 039-14882 were issued on December 28, 1999, August 1, 2000 and February 26, 2002, respectively, Significant Permit Modifications 039-12798 and 039-15355 were issued on February 6, 2000, and March 13, 2002, respectively, Administrative Amendments 039-11533, 039-12485 and 039-15642 were issued on December 17, 1999, September 18, 2000, and June 5, 2002, respectively, and first Reopening 039-13264 was issued on December 31, 2001.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV6-3A	Spray Coating Booth (BR-3)	27.0	2.83	15,000	Ambient
SV6-3B	Spray Coating Booth (BR-3)	27.0	2.83	15,000	Ambient
SV6-4A	Spray Coating Booth (BR-4)	27.0	2.83	15,000	Ambient
SV6-4B	Spray Coating Booth (BR-4)	27.0	2.83	15,000	Ambient
SV6-5A	Spray Coating Booth (BR-5)	27.0	2.83	15,000	Ambient
SV6-5B	Spray Coating Booth (BR-5)	27.0	2.83	15,000	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source and Permit Modifications be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 5, 2002. Additional information was received on July 17, 2002.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification (proposed emission units only)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary

source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	138
PM_{10}	139
SO_2	0.024
VOC	867
CO	3.38
NO_X	4.03

HAPs	**Potential To Emit** (tons/year)
Xylene	202
Toluene	38.9
MIBK	54.4
MEK	42.0
Ethylbenzene	36.0
Glycol Ethers	18.9
HDI	0.238
Benzene	0.00008
Dichlorobenzene	0.00005
Formaldehyde	0.003
Hexane	0.073
Lead	0.00002
Cadmium	0.00004
Chromium	0.00006
Manganese	0.00002
Nickel	0.00008
TOTAL	393

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification and Part 70 Significant Permit Modification. The source modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(A), any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of particulate matter (PM) or particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM_{10}), 326 IAC 2-7-10.5(f)(4)(D), any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of volatile organic compounds (VOC), and 326 IAC 2–7-10.5(f)(6), any modification with a potential to emit greater than or equal to ten (10) tons per year of a single hazardous air pollutant as defined under Section 112(b) of the CAA or twenty-five (25) tons per year of any combination of hazardous air pollutants. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-16219-00157) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

This proposed modification is a modification to the full body coating line, which was also modified in Significant Source Modification 039-14882, issued on February 26, 2002, and a Significant Permit Modification 039-15355, issued on March 13, 2002. The modifications are being made within less than a year of each other and are part of the same coating process. Therefore, the permitted modification and the proposed modification will be treated as a single modification for the purpose of evaluating PSD applicability. The source status will be determined based on the pollutant emissions prior to commencement of the permitted modification.

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	89.0
PM-10	88.4
SO_2	2.33
VOC	232
CO	8.01
NOx	35.7

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the conditions in the permit, Appendix A of the TSD for T039-7571-00157, and the potential to emit tables in T039-7571-00157 and Significant Source Modifications 039-11239-00157 and 039-12223-00157.

Potential to Emit of Modification After Issuance

This proposed modification is a modification to the full body coating line, which was also modified in Significant Source Modification 039-14882, issued on February 26, 2002, and a Significant Permit Modification 039-15355, issued on March 13, 2002. The modifications are being made within less than a year of each other and are part of the same coating process. Therefore, the permitted modification and the proposed modification will be treated as a single modification for the purpose of evaluating PSD applicability.

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Modification, including the proposed emission units and the modification permitted in Significant Source Modification 039-14882 and Significant Permit Modification 039-15355	less than 250	less than 250	0.024	139 (138.28 from spray coating and 0.221 from insignificant combustion)	3.38	4.03	138

PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply. The potentials to emit VOC, PM and PM_{10} are limited as explained under 326 IAC 2-2 (Prevention of Significant Deterioration) in the State Rule Applicability - Individual Facilities section of this document. The potential to emit HAPs are limited as a result of the VOC limit.

Federal Rule Applicability

(a) Although this significant modification does involve a pollutant-specific (VOC) emissions unit with the potential to emit in an amount equal to or greater than 100 tons per year, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable because a control device is not needed in order for the VOC emissions to comply with the limitations of the proposed approval. The potential to emit PM and PM_{10} is less than 100 tons per year from each emission unit in this modification. Therefore, the requirements of 40 CFR Part 64 are also not applicable for PM and PM_{10}.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(c) The motor homes and travel trailers are not automobiles or light duty trucks according to 40 CFR 60.391. Therefore, the requirements of 326 IAC 12 (40 CFR 60.390, Subpart MM), are not applicable.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

(a) The potential to emit VOC from this modification, including the modification permitted in Significant Source Modification 039-14882, issued on February 26, 2002, and Significant Permit Modification 039-15355, issued on March 13, 2002, is limited to less than 138.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, pursuant to 326 IAC 8-1-6. This limit will also make this modification a minor modification to an existing minor source, pursuant to 326 IAC 2-2, with respect to VOC.

(b) The potential to emit PM and PM_{10} is also greater than 250 tons per year before control by the dry filters. Any change or modification that increases the usage of solids in the coatings delivered to the applicators at the five (5) spray coating booths (BR-1 through BR-5) to 23,809 tons per twelve (12) consecutive month period will cause the potential to emit PM and PM_{10} to increase to 250 tons per year or more, making the requirements of 326 IAC 2-2, PSD, applicable based on a sixty-five percent (65%) transfer efficiency and a ninety-seven percent (97%) control efficiency, and shall require prior IDEM, OAQ, approval.

(c) This modification, including the modification permitted in Significant Source Modification 039-14882, issued on February 26, 2002, and Significant Permit Modification 039-15355, issued on March 13, 2002, is a minor modification to an existing minor source, as indicated in (a) and (b). Therefore, the requirements of 326 IAC 2-2 are not applicable. This modification will make

the source a major source pursuant to 326 IAC 2-2, PSD, based on the potential to emit VOC of the emission units in the permit (156 tons from paint areas B-1 and B-2, Spray Paint Booth B-3, FRP Booth, undercoating booth and insignificant activities (Condition D.1.1(c)) + 70 tons from paint booths B-2a and B-2b (Condition D.2.1) + 2.75 tons from EU-04 (Condition D.4.1) + 2.75 tons from the one (1) water based frame paint booth (Condition D.9.3) + 138.28 tons from BR-1 through BR-5 = 370 tons), and future modifications will be reviewed as modifications to an existing major source.

326 IAC 2-4.1-1 (New Source Toxics Control)

The motor homes and travel trailers being coated by the proposed equipment are produced within the existing source. The proposed equipment cannot produce finished product by itself and is not a construction or a reconstruction of the motor home and travel trailer manufacturing process, which was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The potential VOC emissions from the three (3) proposed spray coating booths (BR-3, BR-4 and BR-5) are greater than 25 tons per year. Therefore, the modification is subject to the requirements of 326 IAC 8-1-6. The three (3) proposed spray coating booths are part of an existing spray coating line, consisting of two (2) existing spray coating booths (BR-1 and BR-2). The Best Available Control Technology (BACT) for the existing spray booths was determined as part of Significant Source Modification 039-14882, issued on February 26, 2002, and Significant Permit Modification 039-15355, issued on March 13, 2002. Since the three (3) proposed booths are part of the existing coating process and there are no new control technologies or standards for this type of operation since BACT was determined, the three (3) proposed booths will be incorporated into the BACT for the two (2) existing coating booths. Therefore, the following has been determined to be BACT for the five (5) spray coating booths (BR-1, BR-2, BR-3, BR-4 and BR-5):

(a) The total usage of VOC in the five (5) spray coating booths (BR-1, BR-2, BR-3, BR-4 and BR-5) shall not exceed 138.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

(b) The following work practices:

(1) Cleaning motor home exteriors prior to painting, primer application, and base coat application - motor home exteriors will be hand-wiped with a cleaning solvent prior to the application of the first surface coating.

(2) Primer, base coat, and clear coat application - primer, base coats, and clear coat will be applied using high volume low pressure (HVLP) spray equipment.

(3) Paint repairs - paint repairs will be done using air atomized spray application to achieve the necessary atomization and blend needed for the repair.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This rule does not apply to the proposed spray coating booths, identified as BR-3, BR-4 and BR-5, because this is essentially a fiberglass coating operation. The only metal that may be coated in these booths is metal trim that is on the fiberglass motor home or travel trailer which would be coated together with the fiberglass. The metal trim does not meet any of the applicability criteria listed in 326

IAC 8-2-9(a). Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

(a) The surface coating operations are subject to the requirements of 326 IAC 6-3-2(d), Particulate emission limitations, work practices, and control technologies. Since, this source operates according to a valid Part 70 operating permit issued under 326 IAC 2-7, the requirements of 326 IAC 6-3-2(d)(2) are not applicable. Pursuant to 326 IAC 6-3-2, the surface coating operations shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications. A manufacturing process that is subject to this subsection shall remain subject to it notwithstanding any subsequent decrease in gallons of coating used.

(b) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this modification is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action:

Pursuant to 40 CFR 52, Subpart P, the PM from the five (5) spray coating booths**,** identified as BR-1 through BR-5, and the one (1) spray paint booth located at the Research and Development Center**,** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to the proposed emission units are the same as those already in the Part 70 Operating Permit for the two (2) existing spray coating booths (BR-1 and

BR-2). The three (3) proposed spray coating booths (BR-3, BR-4 and BR-5) have applicable compliance monitoring conditions as specified below:

(a) The Permittee shall implement an operator training program.

(1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operating shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion . Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(3) All operators shall be given refresher training annually.

(b) Additional inspection and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 40 CFR 52, Subpart P, and 326 IAC 2-7 (Part 70) and to make the requirements of 326 IAC 2-2, PSD, not applicable.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

a) EU-01 (Hardwoods)
- One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns, and one (1) Spray Paint Booth B-2, equipped with six (6) HVLP spray guns, for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, each with dry filters for the particulate matter overspray control, and booth B-1 exhausting to stacks SV1-1 and SV1-2 and booth B-2 exhausting to stack SV-91. (1982)
- One (1) Dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

b) EU-02 (Custom Coating)
- Two (2) high volume low pressure (HVLP) spray applications for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

c) EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLP) spray application for coating metal frames, with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

d) EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)

e) EU-05 (FRP), One (1) FRP Booth (seam work on special orders), equipped with three (3) high volume low pressure (HVLP) spray and hand lay up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack SV-5. (1995)

f) EU-06 (R&D, Service & Warranty) **Full body coating**

- One (1) spray paint booth (R & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at Research and Development Center. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and each exhausting at two (2) stacks, identified as SV6-1A and SV6-1B and SV6-2A and SV6-2B, respectively**, capacity: 1.0 motor home or travel trailer per hour, each**. (1998)

- One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.

- One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.

- One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.

g) EU-07 (Woodworking)

- One (1) woodworking shop equipped with woodworking equipment, located in Building 3, using one (1) baghouse as control and exhausting internally, located at North Delaware Street. (1981)
- One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, attached to a portable dust collector as particulate control, exhausted internally, located at Research and Development Center. (1996)
- One (1) woodworking and machining shop equipped with woodworking and metalworking equipment, with one table saw attached to a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity, located at Service and Repair Center. (1998)

h) Four (4) natural gas based Unit Heaters identified as H-1, H-2, H-3 and H-4 each having heat input rate of 0.25 million BTU/hour;

i) One (1) diesel engine Test Cell with a capacity of 260 horsepower;

j) One (1) metal inert gas welding process with 9 welding stations with 1.05 lbs/hour rate of consumption of wire per station;

k) One (1) water based frame paint booth with rate of production as 0.1 unit per hour; and

l) One (1) undercoating booth, identified as EU-08, using an airless spray application system, coating a maximum of 2.5 wood and metal chassis per hour, exhausting to the general ventilation.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

a) Welding operations

b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including three (3) makeup air units with a total heat input capacity of 9.192 million British thermal units per hour.

SECTION D.6

Facility Description [326 IAC 2-7-5(15)]:

EU-06 (R&D, Service & Warranty) **Full body coating**
- One (1) spray paint booth (R & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at Research and Development Center. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and each exhausting at two (2) stacks, identified as SV6-1A and SV6-1B and SV6-2A and SV6-2B, respectively**, capacity: 1.0 motor home or travel trailer per hour, each**. (1998)
- One (1) spray coating booth, identified as BR-3, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-3A and SV6-3B, maximum capacity: 1.0 motor home or trailer per hour.
- One (1) spray coating booth, identified as BR-4, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-4A and SV6-4B, maximum capacity: 1.0 motor home or trailer per hour.
- One (1) spray coating booth, identified as BR-5, used for repairs and special graphics, equipped with high volume, low pressure spray guns for coating and air atomized spray guns for repairs, and dry filters for overspray control, exhausting to stacks SV6-5A and SV6-5B, maximum capacity: 1.0 motor home or trailer per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] **[326 IAC 2-2] [40 CFR 52.21]**

Pursuant to the BACT determination under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), operation of the ~~two (2)~~ **five (5)** spray coating booths (BR-1**,** ~~and~~ BR-2**, BR-3, BR-4 and BR-5**) without the use of add-on controls and with the following emission limitation and work practices will satisfy the BACT requirements **and make the requirements of 40 CFR 52.21 and 326 IAC 2-2, PSD, not applicable**:

(a) The total usage of VOC in the ~~two (2)~~ **five (5)** spray coating booths (BR-1**,** ~~and~~ BR-2**, BR-3, BR-4 and BR-5**) shall not exceed 138.28 tons per twelve (12) consecutive month period**, with compliance determined at the end of each month**.

(b) The following work practices shall be performed:

(1) Cleaning motor home exteriors prior to painting, primer application, and base coat application - motor home exteriors will be hand-wiped with a cleaning solvent prior to the application of the first surface coating.
(2) Primer, base coat, and clear coat application - primer, base coats, and clear coat will be applied using high volume low pressure (HVLP) spray equipment.
(3) Paint repairs - paint repairs will be done using air atomized spray application to achieve the necessary atomization and blend needed for the repair.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.6.3 Particulate Matter (PM **and PM_{10}**) ~~[326 IAC 6-3-2(c)]~~ **[40 CFR 52, Subpart P] [326 IAC 2-2] [40 CFR 52.21]**

(a) Pursuant to ~~326 IAC 6-3-2 (Process Operations)~~ **40 CFR 52, Subpart P**, the PM from the **five (5)** spray **coating** booths**,** identified as BR-1 ~~and BR-2~~ **through BR-5**, and the **one (1)** spray paint booth located at the Research and Development Center shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Any change or modification that increases the usage of solids in the coatings delivered to the applicators at the five (5) spray coating booths (BR-1 through BR-5) to 23,809 tons per twelve (12) consecutive month period shall cause the potential to emit PM and PM_{10} to increase to 250 tons per year or more, making the requirements of 326 IAC 2-2, PSD, applicable based on a sixty-five percent (65%) transfer efficiency and a ninety-seven percent (97%) control efficiency, and shall require prior IDEM, OAQ, approval.

D.6.7 Particulate ~~Matter (PM)~~ **[326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies) and in order to comply with Condition D.6.3, the dry filters for particulate matter overspray control shall be **in operation in accordance with manufacturer's specifications and control emissions from the five (5) spray coating booths (BR-1 through BR-5)** ~~properly in place and maintained to ensure integrity and particulate loading of the filters~~ at all times when the paint booths are in operation.

D.6.9 Record Keeping Requirements

(a) To document compliance with Conditions D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(5)** below. Records maintained for (1) through ~~(6)~~ **(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in Conditions D.6.1 and D.6.2.
(1) The amount and VOC content of each coating material and solvent used. Records

shall include purchase orders, invoices, and EPA VOC Data Sheets necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the month of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.6.3(b), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the solids usage limit and PM and PM_{10} emission limit in Condition D.6.3(b).

(1) The amount and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The total solids usage for each month; and

(3) The weight of PM and PM_{10} emitted for each compliance period.

~~(b)~~**(c)** To document compliance with Condition**s** D.6.7 and D.6.8, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

~~(c)~~**(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The quarterly report form is revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157
Facility: Entire Source
Parameter: VOC ~~emissions~~ **usage** (tons)
Limit: 138.28 tons~~/year~~ **per twelve (12) consecutive month period** from BR-1**,** ~~and~~ BR-2**, BR-3, BR-4 and BR-5**;
70 tons~~/year~~ **per twelve (12) consecutive month period** from B-2a and B-2b; and
<156 tons~~/year~~ **per twelve (12) consecutive month period** from Spray Booths B-1, B-2, B-3, FRP Booth, the undercoating spray booth, and insignificant activities.

This form consists of 2 pages **page 1 of 2**

Month: _____

Facility	VOC Limit (tons/~~year~~ **twelve (12) consecutive month period**)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 ~~and BR-2~~ **through BR-5**	138.28			
Paint Booths B-2a and B-2b	70			
Spray Booths B-1, B-2, and B-3, FRP booth, the undercoating spray booth, and other emissions from insignificant activities	< 156			

This form consists of 2 pages **Page 2 of 2**

Month: _____

Facility	VOC Limit (tons/~~year~~ **twelve (12) consecutive month period**)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 ~~and BR-2~~ **through BR-5**	138.28			
Paint Booths B-2a and B-2b	70			
Spray Booths B-1, B-2, and B-3, FRP booth, the undercoating spray booth and other emissions from insignificant activities	< 156			

Month: _____

Facility	VOC Limit (tons/~~year~~ **twelve (12) consecutive month period**)	VOC Usage this month (tons)	VOC Usage past 11 months (tons)	Total VOC Usage past 12 months (tons)
Fiberglass Coating Operations BR-1 ~~and BR-2~~ **through BR-5**	138.28			
Paint Booths B-2a and B-2b	70			
Spray Booths B-1, B-2, and B-3, FRP booth, the undercoating spray booth and other emissions from insignificant activities	< 156			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the proposed Part 70 Significant Source Modification No. 039-16081-00157 and the proposed Part 70 Significant Permit Modification 039-16219-00157.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Newmar Corporation
Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46550
Part 70 Significant Source Modification: 039-16081
Part 70 Significant Permit Modification: 039-16219
Plt ID: 039-00157
Reviewer: CarrieAnn Paukowits
Date: June 5, 2002

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Full Body Option 1 (Worst Case)																
Basecoat (BR-1 & BR-2)																
STAND BASECOAT STABIL	7.24	97.51%	0.0%	97.5%	0.0%	5.00%	8.00000	2.000	7.06	7.06	112.96	2710.93	494.75	4.42	141.19	65%
Toner (BR-1 & BR-2)																
UNIMIX MET 3-1 GAL	7.78	78.79%	0.0%	78.8%	0.0%	39.00%	6.43800	2.000	6.13	6.13	78.93	1894.27	345.71	32.57	15.72	65%
HS RS GOLD 1 GAL	8.35	54.25%	0.0%	54.3%	0.0%	74.00%	0.12000	2.000	4.53	4.53	1.09	26.09	4.76	1.41	6.12	65%
MAGENTA B 1 QT	7.92	64.77%	0.0%	64.8%	0.0%	39.00%	0.06700	2.000	5.13	5.13	0.69	16.50	3.01	0.57	13.15	65%
HS BLACK 1 GAL	7.95	56.48%	0.0%	56.5%	0.0%	74.00%	0.01500	2.000	4.49	4.49	0.13	3.23	0.59	0.16	6.07	65%
SUPER WHITE 1 GAL	11.86	29.85%	0.0%	29.9%	0.0%	74.00%	0.01500	2.000	3.54	3.54	0.11	2.55	0.47	0.38	4.78	65%
HS ORANGE	10.58	38.75%	0.0%	38.8%	0.0%	51.00%	0.01100	2.000	4.10	4.10	0.09	2.16	0.40	0.22	8.04	65%
BC MIXING CLEAR	7.52	77.93%	0.0%	77.9%	0.0%	50.00%	1.38400	2.000	5.86	5.86	16.22	389.31	71.05	7.04	11.72	65%
Cleaner (BR-1& BR-2)																
HM GUN CLEANER 5 GA	6.74	100.00%	2.0%	98.0%	0.0%	0.00%	2.00000	2.000	6.61	6.61	26.43	634.29	115.76	0.00	N/A	65%
ULTRACLEAN 1 GAL	6.21	100.00%	0.0%	100.0%	0.0%	0.00%	0.09600	2.000	6.21	6.21	1.19	28.62	5.22	0.00	N/A	65%
Clearcoat (BR-1 & BR-2)																
ULTRASOLV #4 REDUCER	7.31	99.86%	0.0%	99.9%	0.0%	0.00%	1.20000	2.000	7.30	7.30	17.52	420.47	76.74	0.04	N/A	65%
SUPER GLAMOUR CLEARC	8.05	46.71%	0.0%	46.7%	0.0%	75.00%	3.84000	2.000	3.76	3.76	28.88	693.07	126.49	50.51	5.01	65%
HARDENER QT	9.03	19.93%	0.0%	19.9%	0.0%	75.00%	0.96000	2.000	1.80	1.80	3.46	82.93	15.13	21.28	2.40	65%
MULTI-FLEX ADDITIVE	8.18	50.00%	0.0%	50.0%	0.0%	100.00%	0.04700	2.000	4.09	4.09	0.38	9.23	1.68	0.59	4.09	65%
Clearcoat [Super Clear] (BR-3 & BR-4)																
ULTRASOLV #4 REDUCER	7.31	99.86%	0.0%	99.9%	0.0%	0.00%	1.20000	2.000	7.30	7.30	17.52	420.47	76.74	0.04	ERR	65%
SUPER GLAMOUR CLEARC	8.05	46.71%	0.0%	46.7%	0.0%	75.00%	3.84000	2.000	3.76	3.76	28.88	693.07	126.49	50.51	5.01	65%
HARDENER QT	9.03	19.93%	0.0%	19.9%	0.0%	75.00%	0.96000	2.000	1.80	1.80	3.46	82.93	15.13	21.28	2.40	65%
MULTI-FLEX ADDITIVE	8.18	50.00%	0.0%	50.0%	0.0%	100.00%	0.04700	2.000	4.09	4.09	0.38	9.23	1.68	0.59	4.09	65%
Primer (BR-1 & BR-2)																
GBP ETCHING FILLER 1	8.83	61.27%	0.0%	61.3%	0.0%	26.00%	0.50000	2.000	5.41	5.41	5.41	129.84	23.70	5.24	20.81	65%
GBP REDUCER 1 G	6.76	29.59%	0.0%	29.6%	0.0%	26.00%	0.50000	2.000	2.00	2.00	2.00	48.01	8.76	7.30	7.69	65%
OFF LINE REPAIR/ SPECIAL GRAPHICS																
Basecoat (BR-5)																
STAND BASECOAT STABIL	7.24	97.51%	0.0%	97.5%	0.0%	5.00%	8.00000	1.000	7.06	7.06	56.48	1355.47	247.37	2.21	141.19	65%
Toner (BR-5)																
UNIMIX MET 3-1 GAL	7.78	78.79%	0.0%	78.8%	0.0%	39.00%	6.43800	1.000	6.13	6.13	39.46	947.14	172.85	16.29	15.72	65%
HS RS GOLD 1 GAL	8.35	54.25%	0.0%	54.3%	0.0%	74.00%	0.12000	1.000	4.53	4.53	0.54	13.05	2.38	0.70	6.12	65%
MAGENTA B 1 QT	7.92	64.77%	0.0%	64.8%	0.0%	39.00%	0.06700	1.000	5.13	5.13	0.34	8.25	1.51	0.29	13.15	65%
HS BLACK 1 GAL	7.95	56.48%	0.0%	56.5%	0.0%	74.00%	0.01500	1.000	4.49	4.49	0.07	1.62	0.30	0.08	6.07	65%
SUPER WHITE 1 GAL	11.86	29.85%	0.0%	29.9%	0.0%	74.00%	0.01500	1.000	3.54	3.54	0.05	1.27	0.23	0.19	4.78	65%
HS ORANGE	10.58	38.75%	0.0%	38.8%	0.0%	51.00%	0.01100	1.000	4.10	4.10	0.05	1.08	0.20	0.11	8.04	65%
BC MIXING CLEAR	7.52	77.93%	0.0%	77.9%	0.0%	50.00%	1.38400	1.000	5.86	5.86	8.11	194.66	35.52	3.52	11.72	65%
Cleaner (BR-5)																
HM GUN CLEANER 5 GA	6.74	100.00%	2.0%	98.0%	0.0%	0.00%	2.00000	1.000	6.61	6.61	13.21	317.15	57.88	0.00	N/A	65%
ULTRACLEAN 1 GAL	6.21	100.00%	0.0%	100.0%	0.0%	0.00%	0.09600	1.000	6.21	6.21	0.60	14.31	2.61	0.00	N/A	65%
Clearcoat (BR-5)																
ULTRASOLV #4 REDUCER	7.31	99.86%	0.0%	99.9%	0.0%	0.00%	1.20000	1.000	7.30	7.30	8.76	210.23	38.37	0.02	N/A	65%
SUPER GLAMOUR CLEARC	8.05	46.71%	0.0%	46.7%	0.0%	75.00%	3.84000	1.000	3.76	3.76	14.44	346.54	63.24	25.25	5.01	65%
HARDENER QT	9.03	19.93%	0.0%	19.9%	0.0%	75.00%	0.96000	1.000	1.80	1.80	1.73	41.46	7.57	10.64	2.40	65%
MULTI-FLEX ADDITIVE	8.18	50.00%	0.0%	50.0%	0.0%	100.00%	0.04700	1.000	4.09	4.09	0.19	4.61	0.84	0.29	4.09	65%
Primer (BR-5)																
GBP ETCHING FILLER 1	8.83	61.27%	0.0%	61.3%	0.0%	26.00%	0.50000	1.000	5.41	5.41	2.71	64.92	11.85	2.62	20.81	65%
GBP REDUCER 1 G	6.76	29.59%	0.0%	29.6%	0.0%	26.00%	0.50000	1.000	2.00	2.00	1.00	24.00	4.38	3.65	7.69	65%
								PM	Control Efficiency	97.00%						
State Potential Emissions				**Add worst case coating to all solvents**					**Uncontrolled**		**493**	**11843**	**2161**	**270**		
									Controlled		**493**	**11843**	**2161**	**8.10**		

METHODOLOGY

			PM after control
Total for BR-1 and BR-2, only:	**1294**	**132**	**3.95**
Total for BR-3 and BR-4, only:	**220**	**72.4**	**2.17**
Total for BR-5, only:	**647**	**65.9**	**1.98**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Newmar Corporation
Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46550
Part 70 Significant Source Modification: 039-16081
Part 70 Significant Permit Modification: 039-16219
Plt ID: 039-00157
Reviewer: CarrieAnn Paukowits
Date: June 5, 2002

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % MEK	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % HDI	Weight % Dibutyl Phythalate	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	MEK Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	HDI Emissions (tons/yr)	Dibutyl Phythalate Emissions (tons/yr)
Full Body Option 1 (Worst Case)																			
Basecoat (BR-1 & BR-2)																			
STAND BASECOAT STABIL	7.24	8.00000	2.000	49.00%	0.00%	0.00%	0.00%	9.00%	0.00%	0.00%	0.00%	248.62	0.00	0.00	0.00	45.66	0.00	0.00	0.00
Toner (BR-1 & BR-2)																			
UNIMIX MET 3-1 GAL	7.78	6.43800	2.000	28.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	122.85	0.00	0.00	0.00	21.94	0.00	0.00	0.00
HS RS GOLD 1 GAL	8.35	0.12000	2.000	35.00%	0.00%	0.00%	0.00%	6.00%	1.00%	0.00%	0.00%	3.07	0.00	0.00	0.00	0.53	0.09	0.00	0.00
MAGENTA B 1 QT	7.92	0.06700	2.000	3.00%	4.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14	0.19	0.14	0.00	0.00	0.00	0.00	0.00
HS BLACK 1 GAL	7.95	0.01500	2.000	37.00%	5.00%	0.00%	0.00%	7.00%	4.00%	0.00%	0.00%	0.00	0.05	0.00	0.00	0.07	0.04	0.00	0.00
SUPER WHITE 1 GAL	11.86	0.01500	2.000	23.00%	0.00%	0.00%	0.00%	4.00%	1.00%	0.00%	0.00%	0.36	0.00	0.00	0.00	0.06	0.02	0.00	0.00
HS ORANGE	10.58	0.01100	2.000	28.00%	1.00%	0.00%	0.00%	5.00%	2.00%	0.00%	0.00%	0.29	0.01	0.00	0.00	0.05	0.02	0.00	0.00
BC MIXING CLEAR	7.52	1.38400	2.000	27.00%	31.00%	0.00%	3.00%	4.00%	5.00%	0.00%	0.00%	24.62	28.26	0.00	2.74	3.65	4.56	0.00	0.00
Cleaner (BR-1& BR-2)																			
HM GUN CLEANER 5 GA	6.74	2.00000	2.000	0.00%	36.04%	9.94%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	42.56	11.74	0.00	0.00	0.00	0.00	0.00
ULTRACLEAN 1 GAL	6.21	0.09600	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clearcoat (BR-1 & BR-2)																			
ULTRASOLV #4 REDUCER	7.31	1.20000	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	9.22	0.00	0.00
SUPER GLAMOUR CLEARC	8.05	3.84000	2.000	0.00%	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	27.08	27.08	0.00	0.00	0.00	0.00
HARDENER QT	9.03	0.96000	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00
MULTI-FLEX ADDITIVE	8.18	0.04700	2.000	0.00%	47.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	1.58	0.00	0.00	0.00	0.00	0.01	0.00
Clearcoat [Super Clear] (BR-3 & BR-4)																			
ULTRASOLV #4 REDUCER	7.31	1.20000	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	9.22	0.00	0.00
SUPER GLAMOUR CLEARC	8.05	3.84000	2.000	0.00%	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	27.08	27.08	0.00	0.00	0.00	0.00
HARDENER QT	9.03	0.96000	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00
MULTI-FLEX ADDITIVE	8.18	0.04700	2.000	0.00%	47.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	1.58	0.00	0.00	0.00	0.00	0.01	0.00
Primer (BR-1 & BR-2)																			
GBP ETCHING FILLER 1	8.83	0.50000	2.000	4.00%	5.00%	9.00%	0.00%	0.00%	10.00%	0.00%	1.00%	1.55	1.93	3.48	0.00	0.00	3.87	0.00	0.39
GBP REDUCER 1 G	6.76	0.50000	2.000	4.00%	0.00%	41.00%	0.00%	0.00%	5.00%	0.00%	0.00%	1.18	0.00	12.14	0.00	0.00	1.48	0.00	0.00
OFF LINE REPAIR/ SPECIAL GRAPHICS																			
Basecoat (BR-5)																			
STAND BASECOAT STABIL	7.24	8.00000	1.000	49.00%	0.00%	0.00%	0.00%	9.00%	0.00%	0.00%	0.00%	124.31	0.00	0.00	0.00	22.83	0.00	0.00	0.00
Toner (BR-5)																			
UNIMIX MET 3-1 GAL	7.78	6.43800	1.000	28.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	61.43	0.00	0.00	0.00	10.97	0.00	0.00	0.00
HS RS GOLD 1 GAL	8.35	0.12000	1.000	35.00%	0.00%	0.00%	0.00%	6.00%	1.00%	0.00%	0.00%	1.54	0.00	0.00	0.00	0.26	0.04	0.00	0.00
MAGENTA B 1 QT	7.92	0.06700	1.000	3.00%	4.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07	0.09	0.07	0.00	0.00	0.00	0.00	0.00
HS BLACK 1 GAL	7.95	0.01500	1.000	37.00%	5.00%	0.00%	0.00%	7.00%	4.00%	0.00%	0.00%	0.19	0.03	0.00	0.00	0.04	0.02	0.00	0.00
SUPER WHITE 1 GAL	11.86	0.01500	1.000	23.00%	0.00%	0.00%	0.00%	4.00%	1.00%	0.00%	0.00%	0.18	0.00	0.00	0.00	0.03	0.01	0.00	0.00
HS ORANGE	10.58	0.01100	1.000	28.00%	1.00%	0.00%	0.00%	5.00%	2.00%	0.00%	0.00%	0.14	0.01	0.00	0.00	0.03	0.01	0.00	0.00
BC MIXING CLEAR	7.52	1.38400	1.000	27.00%	31.00%	0.00%	3.00%	4.00%	5.00%	0.00%	0.00%	12.31	14.13	0.00	1.37	1.82	2.28	0.00	0.00
Cleaner (BR-5)																			
HM GUN CLEANER 5 GA	6.74	2.00000	1.000	0.00%	36.04%	9.94%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	21.28	5.87	0.00	0.00	0.00	0.00	0.00
ULTRACLEAN 1 GAL	6.21	0.09600	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clearcoat (BR-5)																			
ULTRASOLV #4 REDUCER	7.31	1.20000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	4.61	0.00	0.00
SUPER GLAMOUR CLEARC	8.05	3.84000	1.000	0.00%	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	13.54	13.54	0.00	0.00	0.00	0.00
HARDENER QT	9.03	0.96000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00
MULTI-FLEX ADDITIVE	8.18	0.04700	1.000	0.00%	47.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	0.79	0.00	0.00	0.00	0.00	0.00	0.00
Primer (BR-5)																			
GBP ETCHING FILLER 1	8.83	0.50000	1.000	4.00%	5.00%	9.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.77	0.97	1.74	0.00	0.00	1.93	0.00	0.00
GBP REDUCER 1 G	6.76	0.50000	1.000	4.00%	0.00%	41.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.59	0.00	6.07	0.00	0.00	0.74	0.00	0.00
											Individual Total	**604**	**113**	**109**	**71.8**	**108**	**38.2**	**0.397**	**0.387**
											Overall Total	**1045**							
											Total for BR-1 and BR-2, only:	**403**	**74.6**	**54.6**	**29.8**	**72.0**	**19.3**	**0.159**	**0.387**
											Total for BR-3 and BR-4, only:	**0.000**	**1.58**	**27.1**	**27.1**	**0.000**	**9.22**	**0.159**	**0.000**
HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs											Total for BR-5, only:	**202**	**37.3**	**27.3**	**14.9**	**36.0**	**9.65**	**0.079**	**0.000**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Newmar Corporation
Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46550
Part 70 Significant Source Modification: 039-16081
Part 70 Significant Permit Modification: 039-16219
Plt ID: 039-00157
Reviewer: CarrieAnn Paukowits
Date: June 5, 2002

Insignificant

Three (3) Make-up Air Units

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.1920	80.52

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.076	0.306	0.024	4.03	0.221	3.38

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Newmar Corporation
Address City IN Zip: 355 North Delaware Street, Nappanee, IN 46550
Part 70 Significant Source Modification: 039-16081
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HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.45E-05	4.83E-05	3.02E-03	7.25E-02	1.37E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	2.01E-05	4.43E-05	5.64E-05	1.53E-05	8.45E-05	0.076

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.